

Uintah Basin Electronic Telecommunications  
d/b/a UBET Wireless  
3843 South Highway 40  
P.O. Box 157  
Roosevelt, Utah 84066

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Washington, D.C. 20554

Re: CC Docket No. 94-102,  
Cellular Radiotelephone Service Station KNKN236,  
Market No. 677(B2), Utah 5(B2) - Carbon RSA;  
Broadband PCS Station KNLG530,  
BTA No. 381, Rock Springs, WY BTA;  
Broadband PCS Station WPQZ730,  
BTA No. 168, Grand Junction, CO BTA;  
Broadband PCS Station WPQZ731,  
BTA No. 110, Denver, CO BTA; and  
Broadband PCS Station WPSZ758,  
BTA No. 399, Salt Lake City - Ogden, UT BTA;  
Transmission of E-911 Calls from TTY Devices.

Sixth Quarterly Report

Dear Ms. Dortch:

This report is filed pursuant to the directive contained in the Commission's Fourth Report and Order (CC Docket No. 94-102), FCC 00-436, released December 14, 2000.

In our Fifth Quarterly Report, we reported that, despite our best efforts, we would not be able to meet the Commission's June 30, 2002 deadline for providing service to digital TTY handsets. As noted in the Fifth Quarterly Report, we have been advised that our existing Nortel switch cannot be upgraded to process digital TTY calls; and, accordingly, providing service to such handsets will require us to install a new switch. To date, we have been unsuccessful in our efforts to obtain a price quote from Nortel for a new switch with digital TTY capability. The Fifth Quarterly Report further stated that we would be requesting a waiver of the requirement that we be able to process calls from digital TTY handsets by June 30, 2002.

The waiver request was filed with the Commission on June 28, 2002 requesting a ten-month extension of time, up to and including April 30, 2003, within which to comply with the requirements of Section 20.18(c) of the Rules. The June 28, 2002 request contains

all supporting particulars, and is incorporated herein by reference as though fully set forth.

Very truly yours,  
Uintah Basin Electronic  
Telecommunications d/b/a  
UBET Wireless

Dated: ✓ July 12, 2002

By: ✓   
Bruce H. Todd,  
General Manager

**Uintah Basin Electronic Telecommunications  
d/b/a UBET Wireless  
Addendum to Sixth Quarterly Report, Filed July 2002**

**Development Activities**

1. **Network Infrastructure Software Development** -- On June 28, 2002, the Filer filed with the Commission a waiver request for a ten-month extension of time, up to and including April 30, 2003, within which to comply with the requirements of Section 20.18(c) of the Rules. The waiver request was predicated on unavailability of equipment.

The Filer continues to be in discussions with its equipment vendor, Nortel. Nortel has indicated that TTY compatible software will be in the MTX 10.0 software load. This software cannot be installed until the current dual-load switch (providing switching services for the Filer's wireless operations and for the landline telephone operations of the Filer's parent corporation) is split and a new switch installed. Nortel no longer provides support services or software upgrades for the existing dual-load switch, and apparently considers it an obsolete technology.

2. **Handset Development And Testing Plans** -- Handset vendors continue to work on the development of a TTY capable handset. The Filer will evaluate these units when they become available.

3. **Beta Testing And Lab Testing** -- The Filer is a small rural carrier, and is looking to its equipment manufacturers to conduct full beta and lab testing of network software, handsets and infrastructure equipment. However, the Filer will test the equipment it procures as soon as practicable, with the goal of making sure it meets the manufacturer's specification.

4. **Release And General Availability To Carriers Of Network Infrastructure Software** -- Unable to determine a firm date at this time with Nortel.

5. **Availability To Carriers Of Full Digital Acceptance Test Units** -- Unable to determine a firm date at this time with Nortel.

6. **Efforts Toward Achieving Digital Wireless Solution Compatibility With Enhanced TTY** -- The Filer continues to pressure its network vendor, Nortel, to provide it with digital wireless TTY hardware and software. To date, the Filer has been unable to obtain a price quote and a delivery date from Nortel. The Filer's existing Dual-load switch must be split to become TTY capable.

**Testing And Deployment Activities**

7. **Carrier Coordination Of Testing With PSAP** -- The Filer will test with PSAPs in the areas where this service will be

deployed. Coordination with the PSAPs will be done on a case-by-case basis, in cooperation with the relevant PSAP personnel.

8. Carrier Testing Activities, Including Field Testing, Consumer End-to-End Testing, And Other Necessary Tests -- All testing will be conducted in accordance with equipment vendor recommendations.

9. Retail Availability Of Necessary Consumer Equipment -- The Filer is unable to determine the general retail availability of consumer equipment. To the best of the Filer's knowledge, none of the leading handset manufacturers has been able to release a date for general availability.

10. Geographic Scope Of Network Infrastructure Development -  
- Since the Filer's network has only one switch, as equipment becomes available it will be deployed across the Filer's entire network.